

## AFFIDAVIT

Commonwealth of Pennsylvania  
County of Erie

I, Randy Davis, the undersigned, being duly sworn, state the following:

1. I am a resident of Erie, PA.
2. I am a former employee of the Booker T. Washington Center, with my tenure lasting from September 1994 to December 2002.
3. During my tenure I have held the positions of Prevention Aide, Fair Housing Counselor, and Housing Director.
4. During my tenure, I implemented/helped developed policies/procedures/practices for the Booker T. Washington Center.
5. During my tenure, I participated in staff meetings where Booker T. Washington Center's policies/procedures/practices were discussed/developed.
6. During my tenure, in addition to those duties specifically related to my job, from time to time, I assisted in /had responsibility for other areas of service, including youth programs.
7. As a result of my specific duties and those periodically assigned to me, staff meetings, staff training, staff communications and organizational structure, I was aware of /knew of/ was involved in most organizational policies/procedures/practices/activities of the Center.
- 8 During the summer of 2002, specifically from July 1, 2002-August 16, 2002, the Booker T. Washington Center operated its Summer Day Camp Program, a program of educational and recreational activities for children from the ages of 6-14.
9. The Booker T. Washington Center has operated the Summer Day Camp Program or similar type programs for most of its 80-year history.
10. As a result of the type of programs it has run through the years, including the Summer Day Camp Program, the Booker T. Washington Center has policies/procedures/practices in place governing those programs.
11. Staff members are aware of these policies/procedures/practices, especially those governing their area of service.
12. Staff in the Summer Day Camp Program was required, among other things, to keep track of all participants.
13. The Booker T. Washington Center, established in 1923, was founded for the purpose of helping poor people, particularly African Americans, succeed in life.
14. On August 6, 2002, I learned of the purported disappearance of one of the participants in the Center's Summer Day Camp Program.
15. I use the word "purported" because there has never been a complete investigation into the child's alleged disappearance.
16. As a result of being notified of the alleged disappearance, I was actively involved in looking for the child.
17. As a result of being a staff member, I am aware of events surrounding the dismissal of Mr.

James Sherrod, Booker T. Washington Center's Former Executive Director.

18. On August 12, 2002, I learned that Mr. Sherrod was fired from staff members and two (2) Booker T. Washington Center's Board members, Mr. Sean Coleman and Mr. Paul Gambill.

19. On August 13, 2002, in a staff meeting Mr. Coleman and Mr. Gambill confirmed Mr. Sherrod's firing to the entire staff.

20. On August 13, 2002, at the staff meeting, Mr. Coleman acknowledged referring to African Americans as "Niggers."

21. On August 6, 2002, the date of the alleged disappearance, Mr. Sherrod was on a scheduled vacation.

22. Mr. Sherrod's vacation was to last from August 5, 2002 to August 9, 2002.


23. Mr. Brian Bessetti, The Booker T. Washington Center's Controller, was in charge of the agency.

24. In Mr. Sherrod's extended absent, Mr. Bessetti had overall responsibility for the Center, including the Summer Day Camp Program.

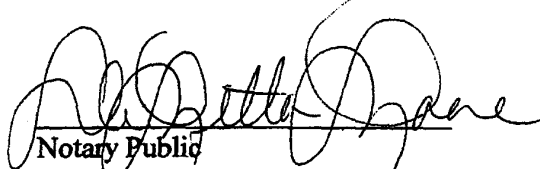
25. Mr. Sherrod interrupted his vacation to respond to the child's alleged disappearance and to ensure the safety of all participants.

26. The Board fired Mr. Sherrod.

27. The Board took no action against Mr. Bessetti.

  
Randy Davis

Sworn to and subscribed before me this 20 day of July 2003.

  
Notary Public

